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ATTORNEY FOR THE DEBTOR
PA S. Ct. No. 48558
FL Bar No.: 0451207

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**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
KIMBERLY A. WANYO	:	Case No.: 05:13-bk-05697
	:	
Debtor	:	

U.S. BANK TRUST NATIONAL ASSOC.,	:	
AS TRUSTEE OF BUNGALOW SERIES	:	
III TRUST	:	
Movant	:	Hearing Date: 10/25/18 at 9:30 a.m.
v.	:	
	:	Response Date: 10/10/18
KIMBERLY A. WANYO,	:	
CHARLES J. DeHART, III, TRUSTEE	:	
	:	
Respondents	:	

OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

The Debtor, KIMBERLY A. WANYO, by and through her counsel, David J. Harris, Esquire, hereby objects to the Motion for Relief of U.S. Bank Trust National Association, as Trustee of Bungalow Series III Trust as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. DENIED. Strict proof thereof is demanded for trial.

6. DENIED. Strict proof thereof is demanded for trial.
 7. ADMITTED.
 8. ADMITTED.
 9. ADMITTED.
 10. DENIED. Strict proof thereof is demanded for trial.
 11. DENIED. Strict proof thereof is demanded for trial.
 12. DENIED. Movant's averment is a conclusion of law to which no responsive pleading is required and therefore such averment is deemed denied.
 13. DENIED. Movant's averment is a conclusion of law to which no responsive pleading is required and therefore such averment is deemed denied.
 14. DENIED. Strict proof thereof is demanded for trial.
- WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

AFFIRMATIVE DEFENSES

15. Debtor hereby incorporates by reference her answers in Paragraphs 1 through 14 above as if made a part hereof.
16. There is sufficient equity in the subject property.
17. Movant is adequately protected.
18. The subject property is necessary to the Debtor for an effective reorganization.
19. There is no cause for granting the relief sought by Movant in its Motion.
20. Movant does not have standing to bring the instant Motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: October 3, 2018
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE